

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO.: 3:22-CV-223-RJC-DCK**

**U.S. SECURITIES AND
EXCHANGE COMMISSION,**

Plaintiff

v.

**WYNN A.D. CHARLEBOIS and
WC PRIVATE LLC,**

Defendants

MOTION FOR EXTENSION OF TIME TO PROVIDE ACCOUNTING

NOW COME defendants Wynn A.D. Charlebois and WC Private LLC, and move for an extension of time to file the accounting ordered by this Court, up to and including June 8, 2022. In support of this motion, defendants show the Court:

1. By order of this Court, defendants were to provide an accounting to this Court and the Commission no later than June 3, 2022 in order to allow defendants to obtain representation to help prepare their responses.
2. The undersigned counsel was retained on June 2, 2022 and met with Mr. Charlebois for the first time the following day.
3. Mr. Charlebois and the undersigned are working to provide the accounting but require additional time.

4. The undersigned has conferred with counsel for the Commission who does not object to an extension until Wednesday, June 8, 2022.

WHEREFORE, defendants move for an extension of time to provide the accounting until June 8, 2022.

Dated: June 6, 2022

Respectfully submitted,

/s/ Noell P. Tin

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*Counsel for defendants Wynn Charlebois and
WC Private LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served the foregoing MOTION FOR EXTENSION OF TIME TO PROVIDE ACCOUNTING with the Clerk of Court using the CM/ECF system, which will send notification of such filing to opposing counsel:

Robert F. Schroeder
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M. Graham Loomis
Regional Trial Counsel
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Dated: June 6, 2022

/s/ Noell P. Tin